

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BRIAN JOSEPH GREF,

Plaintiff,

v.

AMERICAN INTERNATIONAL
INDUSTRIES, et al.

Defendants.

Case No. 1:20-CV-05589-GBD

NOTICE OF WHITTAKER CLARK &
DANIELS, INC.'S CROSS-MOTION
TO COMPEL NON-PARTY
NORTHWELL HEALTH, INC.'S
COMPLETE RESPONSE
TO SUBPOENA

PLEASE TAKE NOTICE that, upon the enclosed Memorandum of Law by Defendant Whittaker, Clark & Daniels, Inc. (which adopts and joins Defendant American International Industries' (A-I-I) Memorandum of Law and all Supporting Papers filed today), WCD asks this Court to enter an Order denying the non-party, Northwell Health, Inc.'s Motion to Modify the Subpoena WCD served on or about October 14, 2022, and cross-moves herein for the Court to enter a further Order compelling Northwell to fully respond to WCD's Subpoena pursuant to Rule 45 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 6.1(a), any opposing affidavits and answering memoranda of law (collectively, "Answering Papers") to the Cross-Motion shall be served within seven (7) days after service of the Moving Papers.

This 21st day of November 2022.

LANDMAN CORSI BALLAINE & FORD P.C.

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